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LG ELECTRONICS U.S.A. INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR. and
CHRISTOPHER MILLS, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

LG ELECTRONICS, INC., LG
ELECTRONICS U.S.A., INC.,
SAMSUNG ELECTRONICS CO.
LTD., SAMSUNG ELECTRONICS
AMERICA, INC., SONY
CORPORATION, and SONY
ELECTRONICS INC.,

And

John and Jane Does (1-Unlimited)

And

ABC Corporations (1-Unlimited),

Defendants.

Civil Action No. 17-1775
(MCA)(SCM)

Hon. Madeline Cox Arleo, U.S.D.J.
Hon. Steven C. Mannion, U.S.M.J.

Return Date: April 2, 2018

(Oral Argument Requested)

Document Electronically Filed

**REPLY DECLARATION OF
JEFFREY J. GREENBAUM IN
SUPPORT OF LG
ELECTRONICS USA, INC.,
SAMSUNG ELECTRONICS
AMERICA, INC., AND SONY
ELECTRONICS INC.'S MOTION
TO DISMISS THE FIRST
AMENDED COMPLAINT
UNDER FED. R. CIV. P. 12(b)(6)**

JEFFREY J. GREENBAUM declares as follows:

1. I am member of the law firm of Sills Cummis & Gross P.C., which, along with Latham & Watkins LLP, represents Defendant LG Electronics U.S.A., Inc. (“LG Electronics”) in the above-captioned action. I submit this Reply Declaration in further support of the Joint Motion to Dismiss filed by LG Electronics, along with Defendants Samsung Electronics America, Inc., and Sony Electronics Inc. (collectively, “Defendants”).

2. Attached hereto as Exhibit 1 is a chart that copies the true and correct language from an opposition brief filed in *In re Vizio, Inc. Consumer Privacy Litigation*, Case No. 16-md-02693-JLS (KESx) (C.D. Cal.) (Dkt. 121) (“*Vizio*”) and Plaintiffs’ opposition brief filed here (Dkt. 56). Plaintiffs’ brief copies almost verbatim large portions of the *Vizio* brief. The chart compares the two briefs side-by-side and highlights in matching colors the portions that Plaintiffs copied.

3. Attached hereto as Exhibit 2 is a true and correct copy of the complaint filed in *Vizio*.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 23, 2018.

s/ Jeffrey J. Greenbaum
Jeffrey J. Greenbaum